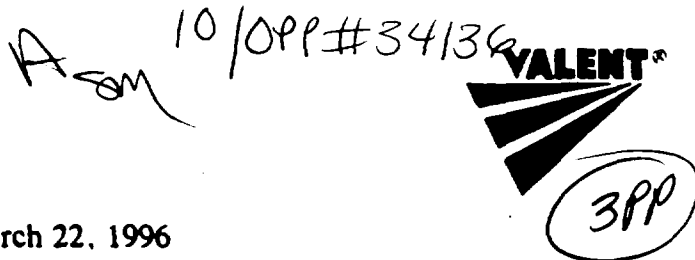


September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

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March 22, 1996

**NALED REREGISTRATION:
RESIDUE FIELD TRIAL REQUIREMENTS**

Case No.: 0092 Naled
EPA Chemical No.: 034401
EPA Company No.: 59639

Ms. Susan Jennings
Office of Pesticide Programs, H7504C
Document Processing Desk: DCI-SRRD-0092
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

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OFFICE OF PESTICIDE PROGRAMS

Dear Ms. Jennings:

In Valent's May 15, 1995 response to the "Naled Task 2B Reregistration Decision: Residue Chemistry Considerations" (August 5, 1994), we proposed a program of seven field residue trials to address EPA's requirement for more geographically representative data to support tolerances for cabbage, cauliflower and collards. The proposed program was designed in such a way as to also support a crop group tolerance for Brassica leafy vegetables. According to the latest update to the RED Residue Chapter, dated January 11, 1996, EPA clarified the data needed to address the concern for geographically representative data, and to support a crop group tolerance on Brassica Leafy Vegetables¹.

Valent has reassessed its position relative to these crops, and has determined that the existing market will not support a nationwide tolerance residue program of the type requested by EPA. Therefore, we are requesting an alternate approach which would preserve the use of the product on these minor crops, while providing EPA the data necessary and appropriate to this use. This approach would entail the establishment of tolerances with regional registration.

As we have indicated on prior occasions, virtually all of the agricultural market for naled, especially for vegetables, is in California. The following table illustrates the actual usage of DIBROM 8 Emulsive, the sole naled product registered by Valent for agricultural uses, on the three crops in question:

¹ In its review, EPA did not take into consideration certain previously submitted trial data. For your information, these data are contained in EPA Acc. No. 73820, submitted September 15, 1966.

	No. of Applications 1993 ¹	Pounds a.i. Applied 1993 ¹	Acres Treated 1993 ¹	Acres Treated 1995 ²
Cabbage	106	1228	873	527
Cauliflower	92	1453	966	963
Collards	57	139	95	0

¹ Source - 1993 Pesticide Use Report compiled by the California-EPA Department of Pesticide Regulation.

² Source - 1995 naled use recommendations recorded by Crop Data Management Systems, Inc. (see our December 14, 1995 submission regarding naled occupational/residential exposure risk assessment for background information on CDMS).

Given the low volume of naled usage on these crops, and the geographically restricted area of use, Valent requests that EPA consider establishment of tolerances with regional registration for these three crops. Data generated in EPA Region 10 should be satisfactory to support such tolerances. According to *EPA Guidance on Number and Location of Domestic Crop Field Trials for Establishment of Pesticide Residue Tolerances* (June 1994), one cabbage trial, three cauliflower trials, and one collards trial are required to be conducted in Region 10 to support a national tolerance. Two broccoli trials have already been conducted in California (EPA Acc. No. 160765) which can be substituted for cauliflower, and a trial on collards conducted in California using a 5X rate (MRID 42529607) should suffice for tolerance support. Therefore, we propose conducting two additional trials, one on cabbage and one on cauliflower, to support tolerances with regional (California-only) registration for cabbage, cauliflower and collards.

If EPA is unable to be flexible with residue requirements pertaining to these three crops, Valent may be forced to drop them from the DIBROM 8 Emulsive label. These are minor uses from the standpoint of sales and profit to Valent, and Valent could not justify a large residue program to support them. This would be an unfortunate conclusion given the ever-diminishing array of tools available to vegetable growers for insect control. Such a decision would also be unnecessary given EPA's conclusion that dietary risk from naled is expected to be minimal.

Please consider our proposal in the final drafting of the residue chapter of the RED document. If you have any questions, please call me at (510) 256-2770, or Brent Solomon at our Washington, D.C. office (202) 872-4682.

Sincerely,

Daniel P. Fay

Daniel P. Fay
Project Manager
Registration & Regulatory Affairs

cc: Mr. Robert Forrest
Product Manager, PM Team 14
Registration Division, EPA/OPP

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